



## Filing Receipt

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COMPLAINT OF JOHN

SOAH DOCKET:

BEFORE THE STATE

BLALOCK AGAINST

473-21-1180.WS

OFFICE OF

MERCY WATER

ADMINISTRATIVE

SUPPLY

HEARINGS

CORPORATION

**REQUEST FOR INFORMATION FOR MERCY FOR RANDALL BAKER**

**I.**

**DUTY TO SUPPLEMENT**

You have a duty to supplement any responses that are incomplete or incorrect when submitted. You have a duty to amend your responses within a reasonable time after you obtain information on the basis of which you know that a response either: (1) was incorrect or incomplete when submitted, or; (2) although correct and complete when submitted is no longer correct and complete, and the circumstances are such that failure to amend the response is, in substance, misleading.

**IV.**

**REQUESTS FOR INFORMATION**

**JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-1**

As stated in Randall Baker's Direct Testimony, "No" to the question of "Was the water meter installed on the Southern Tract meant to provide service to the Nothern Tract?". Yet, Randall Baker supports the statement of "Mercy's operators believed the service address to be the location at which Mercy installed the meter and was not aware the property had been partitioned." As there is a difference between a full 'No' and a belief, can you elaborate on if it is a belief or a full 'No', and what evidence lead to this conclusion. Please provide documents that support your answer.

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-2**

As stated in Randall Baker's Direct Testimony, "I began working as a contractor for Mercy, installing water meters for Mercy's Customers, at or around 1993." Is this the only position you have held, or hold, with Mercy?

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-3**

As stated in Randall Baker's Direct Testimony, "...in case regarding Mercy's cessation of water service to his residence...,". Then are you stating that, prior to the 7<sup>th</sup> day of August of 2020, that Mr. Blalock's residence was receiving water service. Please provide documentation that supports your answer.

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-4**

As stated in Randall Baker's Direct Testimony, "...where Mercy's existing water line crosses Bowen Loop adjacent to the Southern Tract." Please provide maps from 1995 that show the path of all pipes for Mercy in the area, and all permits associated with the work.

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-5**

As stated in Randal Baker's Direct Testimony, "The meter has not been moved since its installation." Does this coincide with Ms. Ivey's records having the same meter number since 1995, when her address was 154 Bowen Road, and her most recent record with the same meter number having the address of 1611 Bowen Loop? Please provide documentation that proves your answer.

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-6**

As stated in Randall Baker's Direct Testimony, "Someone ran a private water line crossing the Southern Tract to the Northern Tract's house without obtaining any easement for the Northern Tract's use of that line." Are easements, such as the one needed, a matter of Mercy or a civil matter of the two land owners, at the time, Gloria Meeks and Reba Ivey? Please provide documentation that supports your answer.

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-7**

As stated in Randall Baker's Direct Testimony, he is familiar with Mercy's membership requirements. Is Randall Baker also familiar with Mercy's requirement that all copies, past and present, of their tariff are supposed to be available for viewing in person and a copy is supposed to be available on their website?

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-8**

As stated in Randall Baker's Direct Testimony, he is familiar with Mercy's membership requirements. This creates the idea that he/you are familiar with Mercy's tariff. According to Mercy's tariff, what is the maximum number of meters for members with STANDARD SERVICE, such as Reba Ivey and Gloria Meeks, under Section E (18) (b). Please provide documentation to support your answer.

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-9**

As stated in Randall Baker's Direct Testimony, "Not to my knowledge, no." Does this mean that an officer or an employee of Mercy could have acted without you having knowledge of the action, or is it possible due to the length of time you have forgotten the action?

#### **JOHN BLALOCK'S REQUEST TO RANDALL BAKER 1-10**

As stated in Randall Baker's Direct Testimony, "I began working as a contractor for Mercy, installing meters for Mercy's customers, at or around 1993." In Randall Baker's time as a contractor for Mercy: (1) How many Meters did you install on the Southern Tract between 1993 and December 26<sup>th</sup> of 1997 for Gloria Meeks; (2) When were those meters installed/removed, and (3) do any of the dates coincide with the meter for Reba Ivey. Please provide documentation to support your responses.

RESPECTFULLY SUBMITTED BY,

/s/ John Blalock